

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

THE RELIGIOUS SISTERS OF MERCY,
et al.,

Plaintiffs,

v.

ALEX M. AZAR, Secretary of the United
States Department of Health and Human
Service, *et al.*,

Defendants.

No. 3:16-cv-386

THE CATHOLIC BENEFITS
ASSOCIATION; DIOCESE OF FARGO;
CATHOLIC CHARITIES NORTH
DAKOTA; and CATHOLIC MEDICAL
ASSOCIATION,

Plaintiffs,

v.

ALEX M AZAR, Secretary of the United
States Department of Health and Human
Service, *et al.*,

Defendants.

No. 3:16-cv-432

Declaration of Douglas G. Wilson Jr.

1. My name is Douglas G. Wilson, Jr. I am over 21 and capable of making this declaration. I have not been convicted of a felony or crime involving dishonesty. The facts herein are within my personal knowledge. If I were called upon to testify to these facts, I could and would competently do so.

2. I serve as the Chief Executive Officer of the Catholic Benefits Association (“CBA”).

3. The CBA is a § 501(c)(3) nonprofit corporation and Catholic ministry. Its articles of incorporation state that it is “organized for charitable purposes” that are “consistent with Catholic values, doctrine, and canon law.” Specifically, they state that the CBA is organized “[t]o support Catholic employers . . . that, as part of their religious witness and exercise, provide health or other benefits to their respective employees in a manner that is consistent with Catholic values”; and “[t]o work and advocate for religious freedom of Catholic and other employers seeking to conduct their ministries and businesses according to their religious values.

4. The CBA currently has among its members over 6,000 Catholic parishes plus 1,336 other member employers including 81 Catholic dioceses and archdioceses. The CBA membership also includes schools, colleges, hospitals, nursing homes, clinics, medical practices, Catholic-owned business, and others. Many of its members receive Medicare and Medicaid funds and other federal financial assistance.


5. All CBA members joined the CBA with the understanding that their identities would remain confidential.

6. Given the present cultural moment where cancellation and other adverse action--whether by social media, boycott, government action, or otherwise--is commonplace, CBA members have substantial concern that if their identities were made public they would face significant adverse action and distraction from their missions because of their Catholic beliefs and their efforts to align their actions with those beliefs.

7. If the CBA was forced to disclose its members’ identities, it would substantially chill the ability of the CBA to advocate for its members First Amendment rights.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on July 21, 2023, at Castle Rock, Colorado.

A handwritten signature in black ink, appearing to read 'Doug Wilson', with a stylized flourish at the end.

Doug Wilson